Eric Holcomb, Governor Cameron F. Clark, Director

Division of Historic Preservation & Archaeology 402 W. Washington Street, W274 Indianapolis, IN 46204-2739 Phone 317-232-1646-Fax 317-232-0693 dhpa@dnr.IN.gov



April 3, 2019

Cindy Shively Klem
Brownfields Program Counsel
Indiana Finance Authority Environmental Program
100 North Senate Avenue, Room 1275
Indianapolis, Indiana 46204

Federal Agency: U.S. Environmental Protection Agency ("EPA")

Re: Information concerning environmental remediation of Tri County Petroleum located at 508 South John Street and 701 East College Street using Brownfields Revolving Loan Fund (RLF) (DHPA #23595)

Dear Ms. Shively Klem:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated March 5, 2019 and received on March 11, 2019, for the above indicated project in Crawfordsville, Montgomery County, Indiana.

In regard to buildings and structures, we have identified the following properties within the probable area of potential effects, and we believe that they may meet the criteria of eligibility for inclusion in the National Register of Historic Places:

Holden House, 512 E. College Street, (site #107-139-28178) Cleveland, Cincinnati, Chicago, and Saint Louis Freight Depot, 512 Wallace Avenue, (site #107-139-28179)

However, based on the information provided to our office, we do not believe that there will be any alterations to the characteristics of the above identified historic properties qualifying them for inclusion in or eligibility for the National Register (see 36 C.F.R. § 800.16[i]).

In terms of archaeology, no currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places have been recorded within the proposed project area. No archaeological investigations appear necessary provided that all project activities remain within areas disturbed by previous construction.

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

At this time, it would be appropriate for the EPA to analyze the information that has been gathered from the Indiana SHPO, the general public, and any other consulting parties and make the necessary determinations and findings. Please refer to the following comments for guidance:

1) If the EPA believes that a determination of "no historic properties affected" accurately reflects its assessment, then it shall provide documentation of its finding as set forth in 36 C.F.R. § 800.11 to the

Cindy Shively Klem April 3, 2019 Page 2

- Indiana SHPO, notify all consulting parties, and make the documentation available for public inspection (36 C.F.R. §§ 800.4[d][1] and 800.2[d][2]).
- 2) If, on the other hand, the EPA finds that an historic property may be affected, then it shall notify the Indiana SHPO, the public and all consulting parties of its finding and seek views on effects in accordance with 36 C.F.R. §§ 800.4(d)(2) and 800.2(d)(2). Thereafter, the EPA may proceed to apply the criteria of adverse effect and determine whether the project will result in a "no adverse effect" or an "adverse effect" in accordance with 36 C.F.R. § 800.5.

If you have questions about archaeological issues please contact Rachel Sharkey at (317) 234-5254 or rsharkey@dnr.IN.gov. If you have questions about buildings or structures please contact Kim Marie Padgett at (317) 234-6705 or kpadgett@dnr.IN.gov. In all future correspondence regarding the above indicated project, please refer to DHPA #23595.

Very truly yours,

Beth K. McCord

Deputy State Historic Preservation Officer

BKM:KMP:RAS:ras

emc: Patricia Polston, U.S. Environmental Protection Agency

Cindy Shively Klem, Program Counsel, Indiana Brownfields Program